

List of Questions and Answers for Continuous Process Vents

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Requirements for Continuous Process Vents are found in 63.1315

What is a Continuous Process Vent? (63.1312)

A continuous process vent is a process vent containing greater than 0.005 wt% total organic HAP from a continuous unit operation within an affected source. The total organic HAP weight percent is determined after the last recover device, as described in 63.115(a) and is determined as specified in 63.115 (c).

Are there any TMPU's not covered by this section? [63.1315(c) & (d)]

If you are a new affected source producing SAN, you are subject instead to section 63.1321.

If you are an affected source producing PET or polystyrene using a continuous process you are subject instead to 63.1316, 63.1317, 63.1318, 63.1319, & 63.1320. Some of these sections may reference 63.1315, but they will be specifically identified.

Is my Continuous Process Vent a Group 1 or Group 2 vent? (63.1312)

If your primary product is ASA/AMSAN, each continuous process vent shall be considered a Group 1 continuous process vent. You do not have to go through the Group determination.

A Group 1 continuous process vent releases a gaseous emission stream that has a total resource effectiveness(TRE) index value #1 unless vent is used during the manufacture of methylmethacrylate butadiene styrene (MBS)for an existing unit. If that is the case, the vent is Group 1 if the TRE value is #3.7.

A Group 2 continuous process vent is a vent that does not fall in the definition of a Group 1 continuous process vent.

What is a Combined Vent Stream? (63.1312)

A combined vent stream is used in reference to batch process vents, continuous process vents, and aggregate batch vent streams, means the emissions from a combination of two or more of the aforementioned types of process vents. The primary occurrence of a combined vent stream is the combined emissions from a continuous process vent and a batch process vent.

Are the Group 1 or Group 2 Definitions Different for Combined Vent Streams (batch vents combined with continuous process vents)? [63.1315(a)(13)(iii)]

In order for the Combined Vent Stream to be a Group 1 continuous process vent the unit must meet all of the following three criteria.

- 1) The TRE index value is #1.0

2) The flow rate of the combined vent stream is ≤ 0.005 standard cubic feet per minute.

3) The total organic HAP concentration is greater than or equal to 50ppmv for the combined vent stream.

If the stream does not meet any of the three criteria it is considered a Group 2 stream.

How do I calculate the TRE index value? (63.115)

The calculations are found in section 63.115. In order to gather the appropriate data for the calculations, the following test methods should be used.

Specific Sampling Sites are located in 63.1315 as well as 63.115

Test Method 40 C.F.R. Part 60 Appendix A (unless noted otherwise)	Purpose	Comments
Method 1 or 1A	Flow measurement using pitot tube.	References to particulate matter do not apply. No traverse necessary if Method 2A or 2D is used to determine gas stream volumetric flow rate.
Method 2, 2A, 2C or 2D	Volumetric Flow Rate	If vent stream passes through a final steam jet ejector and is not condenses, correct to 2.3% moisture.

Test Method 40 C.F.R. Part 60 Appendix A (unless noted otherwise)	Purpose	Comments
Method 18 or Method 25A	Determine the concentration of organic HAP or TOC, as appropriate.	<p>Other methods or data can be used if validated according to Method 301 in appendix A of 40 C.F.R. Part 63.</p> <p>Calibration gas for Method 25A should be the single organic HAP representing the largest percent by volume of the emissions.</p> <p>Using Method 25A is acceptable if the response factor from the high level calibration gas is at least 20 times the standard deviation of the response from the zero calibration gas when instrument is on most sensitive scale.</p>
Method 18	Concentration of organic compounds containing halogens,	<p>Can use process knowledge if no halogen or hydrogen halides;</p> <p>Can also use any other method or data that has been validated according to applicable procedures in Method 301 in Appendix A of 40 C.F.R. Part 63.</p>

What are the control requirements for a Group 1 continuous process vent? [63.113]

A owner or operator can chose to comply with one of the following control options:

-Reduce organic HAP emissions using a flare (63.113 (a)(1)).

- Flare must comply with section 63.11.
 - Requires a visible emission test using techniques
 - Determine the net heating value of gas being combusted.
 - Determine the exit velocity
- Halogenated batch process vents shall not be vented to a flare.

-63.113 (a)(2) Reduce emissions of total organic hazardous air pollutants by 98 wt% or to a concentration of 20ppmv, whichever is less stringent. If supplemental combustion air is used to combust the emissions, correct to 3% oxygen. Compliance can be determined by measuring either organic hazardous air pollutants or total organic carbon. (see 63.116)

-Achieve and maintain a TRE index value greater than 1.0 at the outlet of the final recovery device, or prior to the release of the vent stream to the atmosphere, if no recovery device is present. If the TRE index value is greater than 1.0 comply with the appropriate Group 2 process vent requirements.

-For MBS streams comply by not allowing organic HAP emissions from the collection of continuous process vents to be 0.000590 kg organic HAP per MG of product. [63.1315(b)(2)] See 63.1333(b) for how to determine compliance.

**If I want to comply with the 98 wt% reduction or concentration of 20ppmv what can I do?
[63.113(a)(2)(i)-(ii)]**

You can comply with this option by using any combination of combustion, recovery, and/or recapture device. However, a recovery device cannot be used to meet the 98 wt% reduction unless the following four conditions are met.

- 1) The recovery device was installed prior to the proposal date of JJJ (3/20/95).
- 2) The recovery device that will be used to reduce the emissions of total organic hazardous air pollutants by 98 wt% is the last recovery device before emission to the atmosphere.
- 3) The recovery device, alone, or in combination with one or more combustion or recapture devices, is capable of reduction emissions of total organic hazardous air pollutants by 98 wt%, but is not capable of reliably reducing emissions of total organic hazardous air pollutants to a concentration of 20ppmv.
- 4) The owner or operator disposed of the recovered material, the recovery device would comply with the requirements of this subpart for recapture devices.

If a boiler or process heater is used to comply with the percent reduction requirement, then the vent stream shall be introduced into the flame zone of the device.

What are my monitoring requirements for a Group 1 continuous process vent? 63.114(a)

All equipment should be installed, calibrated, maintained, and operated according to manufacturer's specifications or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accordingly.

Control Device	Monitoring Device	Comments
Incinerator	temperature monitoring device with continuous recorder	For any Incinerator other than a catalytic incinerator the temperature monitoring device shall be installed in the fire box or in the duct work immediately downstream of the fire box in a positions before any substantial heat exchange occurs.
Catalytic Incinerator	temperature monitoring device with continuous recorder	Temperature monitoring device shall be installed in the gas stream immediately before and after the catalyst bed.
Flare	Device capable of continuously detecting the presence of a pilot flame is required.	Examples of some devices include: thermocouple, ultra-violet beam sensor, or infrared sensor
Boiler or process heater less than 44 MW design heat input capacity	Temperature monitoring device in firebox equipped with a continuous recorder is required	Any boiler or process heater in which all vent streams are introduced with the primary fuel or are used as the primary fuel is exempt from this requirement.

Control Device	Monitoring Device	Comments
Scrubber used with incinerator, boiler, or process heater in concert with the combustion of halogenated batch process vents or halogenated aggregate batch vent streams	<p>1) pH monitor equipped with a continuous recorder to monitor the pH of scrubber effluent.</p> <p>2) A flow measurement device equipped with a continuous recorder located at the scrubber influent for liquid flow.</p>	<p>Gas stream flow shall be determined using one of the following procedures.</p> <p>a) using the design blower capacity with appropriate adjustment for pressure drop.</p> <p>b) if subject to 40 C.F.R. 264-266 that have required determination for liquid to gas ratio prior to applicable compliance date for this subpart, the owner or operator may determine gas stream flow by the method that had been utilized to comply with 264-266. A determination that was conducted prior to the compliance date for this subpart may be used to comply if it is still representative.</p>
Scrubber used with incinerator, boiler, or process heater in concert with the combustion of halogenated batch process vents or halogenated aggregate batch vent streams (cont.)		<p>c) prepare and implement a gas stream flow determination plan. Must include a plan that provides the value for representative gas stream flow or highest gas stream flow anticipated. Must include Methodology to be followed and why it will reliably determine the gas stream flow, and a description of the records that will be maintained to document the determination of gas stream flow. The owner or operator shall maintain the plan as specified in 63.1335 (a)</p>

Control Device	Monitoring Device	Comments
Absorber	<p>1) a scrubbing liquid temperature monitoring device; and</p> <p>2) a specific gravity monitor device, each with a continuous recorder.</p>	
Condenser	Condenser exit temperature (product side) monitor device equipped with a continuous recorder.	
Carbon Absorber	<p>1) an integrating regeneration steam flow or nitrogen flow; or</p> <p>2) pressure monitoring device having an accuracy of +/- 10% percent of flow rate level, or pressure, or better, capable of recording the total regeneration steam flow or nitrogen flow, or pressure (gauge or absolute) for each regeneration cycle;</p> <p>Must also have a carbon bed temperature monitoring device, capable of recording the carbon temperature after each regeneration and within 15 minutes of completing any cooling cycle is required.</p>	
Alternative Control or Monitoring	<p>Required if uses a combustion device other than a incinerator, boiler, process heater or flare.</p> <p>Or uses one of the combustion or recovery or recapture device but seeks to monitor a parameter other than those listed.</p>	Must submit a request according to procedures in 63.1327 (f) and 63.1335 (f).

Control Device	Monitoring Device	Comments
Bypass Lines	<p>Chose One:</p> <p>1) properly install, maintain, and operate a flow indicator that takes readings at least once every 15 minutes. Records shall be generated as specified in 63.1326 (e)(3). The flow indicator shall be installed at the entrance to any bypass line that could divert emissions away from the control device and into the atmosphere.</p> <p>2) Secure the bypass line damper or valve in the non-diverting position with a car-seal or lock and key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the damper or valve is maintained in the non-diverting position and emissions are not diverted through the bypass line. Records shall be generated as specified in 63.1326(e)(4).</p>	Equipment such as log leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to these requirements.

Do I need to conduct a performance test? [63.116]

If you use a flare to comply with the Group 1 control requirement, the compliance demonstration should be done using Method 22 of 40 C.F.R. part 60 Appendix A, to determine visual emissions. You do not need to conduct a performance test to determine the percent emission reduction or out let organic HAP or TOC concentration.

- Other exemptions:
- A boiler or process heater with a design heat input capacity of 44 MW or greater.
 - A boiler or process heater where the process vent stream is introduced with the primary fuel or is used as the primary fuel.
 - A control device for which a performance test was conducted for

determining compliance with a regulation promulgated by the EPA and the test was conducted using the same methods specified in this regulation, and no process changes were made since the test, or the owner demonstrates that the results of the performance test, with or without adjustments, reliably demonstrate compliance despite process changes.

- A boiler or process heater burning hazardous waste for which the owner or operator has: 1) Been issued a final permit under 40 CFR part 270 and complies with the requirements of 40 CFR part 266 subpart H or 2) Has certified compliance with the interim status requirements of 40 CFR part 266 Subpart H.

- A hazardous waste incinerator for which the owner or operator has been issued a final permit under 40 CFR part 270 and complies with the requirements of 40 CFR part 264 subpart O, or has certified compliance with the interim status requirements of 40 CFR part 265 subpart O.

So I need to conduct a performance test, what do I need to do? [63.116]

Test Method 40 C.F.R. Part 60 Appendix A (unless noted otherwise)	Purpose	Comments
Method 1 or 1A	Flow measurement using pitot tube.	References to particulate matter do not apply. No traverse necessary if Method 2A or 2D is used to determine gas stream volumetric flow rate.
Method 2, 2A, 2C or 2D	Volumetric Flow Rate	If vent stream passes through a final steam jet ejector and is not condenses, correct to 2.3% moisture.

Test Method 40 C.F.R. Part 60 Appendix A (unless noted otherwise)	Purpose	Comments
Method 18 or Method 25A	Determine the concentration of organic HAP or TOC, as appropriate.	<p>Other methods or data can be used if validated according to Method 301 in appendix A of 40 C.F.R. Part 63.</p> <p>Calibration gas for Method 25A should be the single organic HAP representing the largest percent by volume of the emissions.</p> <p>Using Method 25A is acceptable if the response factor from the high level calibration gas is at least 20 times the standard deviation of the response from the zero calibration gas when instrument is on most sensitive scale.</p>
Method 26 or Method 26A	Concentration of organic compounds containing halogens,(milligrams per dry standard cubic meter)	<p>Can use process knowledge if no halogen or hydrogen halides;</p> <p>Can also use any other method or data that has been validated according to applicable procedures in Method 301 in Appendix A of 40 C.F.R. Part 63.</p>

Please reference 63.1315 (a)(13 - 18) for appropriate sampling sites for combined vent streams and continuous vent streams.

What are the reporting and recordkeeping requirements for Group and TRE determinations and performance tests? [63.117(a)]

Keep an up-to date, readily accessible record of the following data and report in the Notification of Compliance Status reports. Provide the established range for the parameter monitoring that indicates proper operation of the control or recovery device.

Unit	Requirement
Incinerators/catalytic incinerator	<p>Parameter monitoring results (see Table 3 in 40 C.F.R. Part 63 Subpart G)</p> <p>The percent reduction of organic HAP or TOC, or the concentration of organic HAP or TOC determined at the outlet corrected to a dry basis and 3wt% oxygen if supplemental combustion air is used.</p>
Boiler or Process Heater	<p>Parameter monitoring results (see Table 3 in 40 C.F.R. Part 63 Subpart G)</p> <p>A description of the location at which the vent stream is introduced to the boiler or process heater.</p> <p>If design heat input capacity is less than 44 MW and where the process vent stream is introduced with combustion air or used as a secondary fuel, the percent reduction of organic HAP or TOC, or the concentration of organic HAP or TOC at the outlet corrected a dry basis and 3wt% oxygen if supplemental combustion air is used.</p>
Flare	<p>Flare design (i.e. steam assisted, air assisted, or non assisted)</p> <p>All visible emission readings, heat content, determinations, flow rate measurements, and exit velocity determinations made during the compliance determination.</p> <p>All periods during the compliance determination when the pilot flame is absent.</p>

Unit	Requirement
Scrubber following a combustion device to control a halogenated process stream	<p>The percent reduction or scrubber outlet mass emission rate of total hydrogen halides and halogens.</p> <p>The pH of the scrubber effluent</p> <p>The scrubber liquid to gas ratio.</p>
Absorbers, condensers, or carbon adsorbers.	<p>Parametric monitoring results (see table 4 of 40 C.F.R. Part 63 subpart G)</p> <p>The measurements and calculations performed to determine the TRE index value of the vent stream.</p>
Halogen Concentration	Record and Report the halogen concentration used in the TRE index value of the vent stream.
Other Control or Recovery devices	Submit a description of planned reporting and recordkeeping procedures.

What are the periodic recordkeeping and recording requirements for Group 1 continuous vent streams? [63.118(a)]

The following records should be kept up to date and readily accessible:

- Continuous records of the equipment operating parameters specified in the monitoring section and listed in 40 CFR Part 63 Subpart G Table 3. For Flares the hourly records and records of pilot flame outages shall be kept in place of continuous records.
- Records of the daily average value of each continuously monitored parameter for each operating day. For flares, records of the times and duration of all periods during which all pilot flames are absent shall be kept instead of daily averages.
- Hourly records of whether the bypass flow indicator was operating and whether flow was detected at any time under the hour, as well as records of the times and durations of all periods when the vent stream is diverted from the control device or the monitor is not operating.
- Where a seal mechanism is used to detect bypasses, the owner or operator shall record that the monthly visual inspection of the seals or closure mechanism has been done, and shall record the duration of all periods when the seal mechanism is broken, the bypass line valve position has changed, or the key for a lock and key type lock has been checked out, and records of any car-seal that has broken.

Periodic Reports should contain:

Reports of daily average values of monitored parameters for all operating days when the daily average values recorded under paragraphs (b) in this section were outside the ranges established in the Notification of Compliance status or operating permit.

Reports of the times and duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data.

Reports of all times and durations when the vent stream is diverted from the control device to the vent stream by use of a bypass line or a broken seal mechanism, or a key to the keyed bypass line was checked out.

Reports of the times and durations of all periods recorded which the pilot flame of a flare were absent.

What are the specific control requirements for Group 1 halogenated streams? [63.113(c)]

Halogenated streams that are being combusted can be controlled in one of the following two manners.

Option 1 - Vent stream exiting the combustion device should be ducted to a halogen reduction device (e.g. scrubber), before being emitted to the atmosphere. The halogen reduction device shall reduce overall emissions of hydrogen halides and halogens by 99% or shall reduce the outlet mass of total hydrogen halides and halogens to less than 0.45 kg/hr, whichever is less stringent.

However, if the halogen reduction device was installed prior to March 29, 1995, the device shall reduce overall emissions by 95% or 0.45 kg/hr, whichever is less stringent.

Option 2 - A halogen reduction device may be used to reduce the vent stream prior to the introduction to the combustion device, making it a non-halogenated stream. The halogen atom mass must be reduced to 0.45 kg/hr to make it non-halogenated.

What are the requirements for a Group 2 continuous process vents? PART A [63.113(d)]

There are different requirements dependent on your TRE index value, process flow rates, and HAP concentrations

For MBS units: If you meet the following three conditions,

- 1) Flow rate \leq 0.005 scm/min.

- 2) HAP concentration \leq 50ppmv.
- 3) A TRE index value $>$ 3.7 but \leq 6.7

For all other subject units: If you meet the following three conditions,

- 1) Flow rate \leq 0.005 scm/min.
- 2) HAP concentration \leq 50ppmv.
- 3) A TRE index value $>$ 1 but \leq 4

You need to comply with the following requirements:

Maintain a TRE index value $>$ 3.7 for MBS units and $>$ 1.0 for all other subject units.

Monitoring and Recovery device parameters:

If you use one or more recovery devices: install either an organic monitoring device equipped with a continuous recorder or the following monitoring equipment.

- 1) Absorber is final recovery device: scrubbing liquid temperature monitoring device, a specific gravity monitoring device, each equipped with a continuous recorder.
- 2) Condenser is final recovery device a condenser exit (product side) temperature monitoring device equipped with a continuous recorder shall be used.
- 3) Carbon adsorber is the final recovery device, an integrating regeneration stream flow monitoring device having an accuracy of $\pm 10\%$ or better, capable of recording the total regeneration stream mass or volumetric flow for each regeneration cycle; and a carbon bed temperature monitoring device, capable of recording the carbon bed temperature after each regeneration and within 15 minutes of completing any cooling cycle.

OR An operator can request approval to monitor other parameters, approval shall be requested if the owner or operator:

- 1) Uses a combustion device other than a incinerator, boiler, process heater, or flare; or
- 2) Maintains a TRE greater than 3.7 \leq 6.7 for MBS units or

greater than 1.0 # 4 for other subject units. Without the use of a recovery device or the recovery devices listed above, or

- 3) Uses a incinerator, boiler, process heater, or flare and seeks to monitor a parameter other than those listed in 63.114 (a).

Recordkeeping and Reporting Requirements for Group Determination and Performance Tests [63.117(a)]

Keep the following records and report them in the Notification of Compliance status report. Specify the range for the monitoring parameter that indicates proper operation in the Notification of Compliance status report as well.

Unit	Requirement
Incinerators/catalytic incinerator	<p>Parameter monitoring results (see Table 3 in 40 C.F.R. Part 63 Subpart G)</p> <p>The percent reduction of organic HAP or TOC, or the concentration of organic HAP or TOC determined at the outlet corrected to a dry basis and 3wt% oxygen if supplemental combustion air is used.</p>
Boiler or Process Heater	<p>Parameter monitoring results (see Table 3 in 40 C.F.R. Part 63 Subpart G)</p> <p>A description of the location at which the vent stream is introduced to the boiler or process heater.</p> <p>If design heat input capacity is less than 44 MW and where the process vent stream is introduced with combustion air or used as a secondary fuel, the percent reduction of organic HAP or TOC, or the concentration of organic HAP or TOC at the outlet corrected a dry basis and 3wt% oxygen if supplemental combustion air is used.</p>

Unit	Requirement
Flare	<p>Flare design (i.e. steam assisted, air assisted, or non assisted)</p> <p>All visible emission readings, heat content, determinations, flow rate measurements, and exit velocity determinations made during the compliance determination.</p> <p>All periods during the compliance determination when the pilot flame is absent.</p>
Scrubber following a combustion device to control a halogenated process stream	<p>The percent reduction or scrubber outlet mass emission rate of total hydrogen halides and halogens.</p> <p>The pH of the scrubber effluent</p> <p>The scrubber liquid to gas ratio.</p>
Absorbers, condensers, or carbon adsorbers.	<p>Parametric monitoring results (see table 4 of 40 C.F.R. Part 63 subpart G)</p> <p>The measurements and calculations performed to determine the TRE index value of the vent stream.</p>
Halogen Concentration	Record and Report the halogen concentration used in the TRE index value of the vent stream.
Other Control or Recovery devices	Submit a description of planned reporting and recordkeeping procedures.

-if you have a combined continuous process vent stream and are trying to demonstrate it is group two by one of the following:[63.117(c) and (d)]

- S** flow rate less than 0.005 standard cubic meter per minute, must submit the flow rate measurements with the Notification of Compliance status
- S** HAP or TOC concentration less than 50 ppmv, must submit an organic HAP or TOC concentration measurement with the Notification of Compliance status.
- S**

Periodic Recordkeeping and Reporting: [63.118]

Recordkeeping:

Continuous records of equipment monitoring parameters and records of the daily average value of each continuously monitored parameter for each operating day. If a carbon adsorber regeneration stream flow and carbon bed regeneration temperatures are monitored, the records should be kept instead of the daily average.

Reporting:

If you have a combined continuous process vent stream with a flow rate less than 0.005 scm/minute and a process change occurs making it a Group 2 vent with a TRE of greater than 3.7 and less than or equal to 6.7 for MBS or TRE greater than 1.0 and less than or equal to 4.0 for other subject processes, submit the following:

- A description of the process change
- Results of the recalculation of the TRE index value
- A statement that the owner or operator will comply with the requirements specified.

If you have a combined continuous process vent stream with a concentration less than 50 ppmv and a process change occurs making it a Group 2 vent with a TRE of greater than 3.7 and less than or equal to 6.7 for MBS or TRE greater than 1.0 and less than or equal to 4.0 for other subject processes, submit the following:

- A description of the process change
- Results of the recalculation of the TRE index value
- A statement that the owner or operator will comply with the requirements specified.

Periodic Reports should contain:

Reports of daily average values of monitored parameters for all operating days when the daily average values recorded under paragraphs (b) in this section were outside the ranges established in the Notification of Compliance status or operating permit.

Reports of all times and durations when the vent stream is diverted from the control device to the vent stream by use of a bypass line or a broken seal mechanism, or a key to the keyed bypass line was checked out.

Reports of the times and durations of all periods recorded which the pilot flame of a flare were absent.

Reports of all carbon bed regeneration cycles during which the parameters recorded were outside the ranges established in the Notification of compliance status or operating permit.

What are the requirements for a Group 2 continuous process vents? PART B [63.113(e)]

If you have a MBS process with a TRE index value greater than 6.7 or for other subject processes with a TRE index value greater than 4.0, you need to comply with the following:

Maintain a TRE index value greater than 6.7 for MBS process or greater than 4.0 for other subject processes.

Maintain the following records and submit as part of the Notification of Compliance Status:

- measurements, engineering assessments, and calculations performed to determine the TRE index value of the vent stream. Documentation of engineering assessments shall include all data, assumptions, and procedures used for the engineering assessments. [63.117(b)]

Periodic Recordkeeping and Reporting [63.118(c) & (h)]

Up to date and readily accessible records of any process changes and any recalculations of the TRE index value.

When any process change that causes a Group 2 vent making MBS with a TRE value greater than 6.7 to become less than 6.7 or any Group 2 vent making other subject thermoplastics with a TRE value greater than 4.0 to become less than 4.0:

Submit in a report 180 days after the change or as part of the next period report.

- A description of the process change
- Results of the recalculation of the TRE index value
- A statement that the owner or operator will comply with the requirements specified.